

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

CORE WIRELESS LICENSING S.A.R.L.,	§	
	§	
<i>Plaintiff,</i>	§	Civil Action No. 6:12-CV-100-LED
	§	
v.	§	
	§	
APPLE, INC.,	§	JURY TRIAL DEMANDED
	§	
<i>Defendant.</i>	§	
	§	

**DEFENDANT APPLE INC.’S ANSWER, DEFENSES AND COUNTERCLAIMS TO
CORE WIRELESS LICENSING S.A.R.L’S SECOND AMENDED COMPLAINT**

This is Apple Inc.’s (“Apple”) responsive pleading under Fed. R. Civ. P. 12, and contains Apple’s defenses to the Claims asserted by plaintiff Core Wireless Licensing S.A.R.L. (“Core Wireless”), as well as Apple’s Counterclaims.

THE PARTIES

1. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1, and therefore denies the same.
2. Apple admits the allegations in Paragraph 2.

JURISDICTION

3. The allegations in Paragraph 3 state conclusions of law to which no response is required.
4. Apple admits that this Court may exercise personal jurisdiction over Apple.

Apple admits that its accused products (which are manufactured and assembled by third parties) are and have been used, offered for sale, sold, and purchased in the Eastern District of Texas. Apple denies the remaining allegations in Paragraph 4.

VENUE

5. Apple denies that venue would be most convenient in this District (and will be shortly filing a motion to transfer to the Northern District of California) and denies that it has committed any acts of infringement.

FACTUAL ALLEGATIONS

6. Apple admits that United States Patent No. 6,792,277 ("the '277 patent") is entitled *Arranging Control Signallings In Telecommunications System*; that the '277 patent indicates that it was issued by the United States Patent and Trademark Office ("USPTO") on September 14, 2004; and that an uncertified copy of the '277 patent is attached to the Second Amended Complaint (the "Complaint") as Exhibit 1. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '277 patent, and therefore denies the same.

7. Apple admits that United States Patent No. 6,697,347 ("the '347 patent") is entitled *Method And Apparatus For Controlling Transmission Of Packets In A Wireless Communication System*; that the '347 patent indicates that it was issued by the USPTO on February 24, 2004; and that an uncertified copy of the '347 patent is attached to the Complaint as Exhibit 2. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '347 patent, and therefore denies the same.

8. Apple admits that United States Patent No. 7,447,181 ("the '181 patent") is entitled *Method And Apparatus For Improving A Mobile Station Cell Change Operation In The General Packet Radio System (GPRS)*; that the '181 patent indicates that it was issued by the USPTO on November 4, 2008; and that an uncertified copy of the '181 patent is attached to the Complaint as Exhibit 3. Apple lacks knowledge or information sufficient to form a belief as to

whether Core Wireless is the current owner of all rights, title, and interest in the '181 patent, and therefore denies the same.

9. Apple admits that United States Patent No. 6,788,959 ("the '959 patent") is entitled *Method And Apparatus For Transmitting And Receiving Dynamic Configuration Parameters In A Third Generation Cellular Telephone Network*; that the '959 patent indicates that it was issued by the USPTO on September 7, 2004; and that an uncertified copy of the '959 patent is attached to the Complaint as Exhibit 4. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '959 patent, and therefore denies the same.

10. Apple denies that United States Patent No. 7,529,271 ("the '271 patent") is entitled *Method And System For Controlling Data Transmission With Connection States*. Apple admits that the '271 patent indicates that it was issued by the USPTO on May 5, 2009, and that an uncertified copy of the '271 patent is attached to the Complaint as Exhibit 5. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '271 patent, and therefore denies the same.

11. Apple admits that United States Patent No. 6,266,321 ("the '321 patent") is entitled *Method For Transmitting Two Parallel Channels Using Code Division And An Apparatus Realizing The Method*; that the '321 patent indicates that it was issued by the USPTO on July 24, 2001; and that an uncertified copy of the '321 patent is attached to the Complaint as Exhibit 6. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '321 patent, and therefore denies the same.

12. Apple admits that United States Patent No. 6,978,143 (“the ’143 patent”) is entitled *Method And Arrangement For Managing Packet Data Transfer In A Cellular System*; that the ’143 patent indicates that it was issued by the USPTO on December 20, 2005; and that an uncertified copy of the ’143 patent is attached to the Complaint as Exhibit 7. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the ’143 patent, and therefore denies the same.

13. Apple admits that United States Patent No. 7,804,850 (“the ’850 patent”) is entitled *Slow Mac-E For Autonomous Transmission In High Speed Uplink Packet Access (HSUPA) Along With Service Specific Transmission Time Control*; that the ’850 patent indicates that it was issued by the USPTO on September 28, 2010; and that an uncertified copy of the ’850 patent is attached to the Complaint as Exhibit 8. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the ’850 patent, and therefore denies the same.

14. Apple admits that United States Patent No. 7,817,679 (“the ’679 patent”) is entitled *Method And A System For Transferring AMR Signaling Frames On Halfrate Channels*; that the ’679 patent indicates that it was issued by the USPTO on October 19, 2010; and that an uncertified copy of the ’679 patent is attached to the Complaint as Exhibit 9. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the ’679 patent, and therefore denies the same.

15. Apple admits that United States Patent No. 7,415,045 (“the ’045 patent”) is entitled *Method And A System For Transferring AMR Signaling Frames On Halfrate Channels*; that the ’045 patent indicates that it was issued by the USPTO on August 19, 2008; and that an uncertified copy of the ’045 patent is attached to the Complaint as Exhibit 10. Apple lacks

knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '045 patent, and therefore denies the same.

16. Apple admits that United States Patent No. 6,674,860 ("the '860 patent") is entitled *Method And Arrangement For Managing A Service In A Mobile Communications System*; that the '860 patent indicates that it was issued by the USPTO on January 6, 2004; and that an uncertified copy of the '860 patent is attached to the Complaint as Exhibit 11. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '860 patent, and therefore denies the same.

17. Apple admits that United States Patent No. 7,383,022 ("the '022 patent") is entitled *Mobile Equipment Based Filtering For Packet Radio Service*; that the '022 patent indicates that it was issued by the USPTO on June 3, 2008; and that an uncertified copy of the '022 patent is attached to the Complaint as Exhibit 12. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '022 patent, and therefore denies the same.

18. Apple admits that United States Patent No. 7,599,664 ("the '664 patent") is entitled *Mobile Equipment Based Filtering For Packet Radio Service (PRS)*; that the '022 patent indicates that it was issued by the USPTO on October 6, 2009; and that an uncertified copy of the '022 patent is attached to the Complaint as Exhibit 13. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '664 patent, and therefore denies the same.

FIRST COUNT

(Infringement of the '277 patent)

19. Apple incorporates by reference its responses to Paragraphs 1-18 of this Answer as if fully set forth herein.

20. Apple denies the allegations in Paragraph 20.
21. Apple denies the allegations in Paragraph 21.
22. Apple denies the allegations in Paragraph 22.
23. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 23.
24. Apple denies the allegations in Paragraph 24.
25. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25, and therefore denies the same.
26. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26, and therefore denies the same.
27. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27, and therefore denies the same.
28. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28, and therefore denies the same.
29. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29, and therefore denies the same.
30. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30, and therefore denies the same.
31. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31, and therefore denies the same.
32. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32, and therefore denies the same.

33. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33, and therefore denies the same.

34. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34, and therefore denies the same.

35. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35, and therefore denies the same.

36. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36, and therefore denies the same.

37. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37, and therefore denies the same.

38. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38, and therefore denies the same.

39. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39, and therefore denies the same.

40. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40, and therefore denies the same.

41. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41, and therefore denies the same.

42. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42, and therefore denies the same.

43. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43, and therefore denies the same.

44. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44, and therefore denies the same.

45. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45, and therefore denies the same.

46. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46, and therefore denies the same.

47. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47, and therefore denies the same.

48. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48, and therefore denies the same.

49. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49, and therefore denies the same.

50. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50, and therefore denies the same.

51. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51, and therefore denies the same.

52. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52, and therefore denies the same.

53. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53, and therefore denies the same.

54. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54, and therefore denies the same.

55. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55, and therefore denies the same.

56. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56, and therefore denies the same.

57. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57, and therefore denies the same.

58. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58, and therefore denies the same.

59. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59, and therefore denies the same.

60. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60, and therefore denies the same.

61. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61, and therefore denies the same.

62. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62, and therefore denies the same.

63. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63, and therefore denies the same.

64. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64, and therefore denies the same.

65. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65, and therefore denies the same.

66. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66, and therefore denies the same.

67. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67, and therefore denies the same.

68. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68, and therefore denies the same.

69. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69, and therefore denies the same.

70. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70, and therefore denies the same.

71. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71, and therefore denies the same.

72. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72, and therefore denies the same.

73. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73, and therefore denies the same.

74. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74, and therefore denies the same.

75. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75, and therefore denies the same.

76. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76, and therefore denies the same.

77. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77, and therefore denies the same.

78. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78, and therefore denies the same.

79. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79, and therefore denies the same.

80. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 80, and therefore denies the same.

81. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81, and therefore denies the same.

82. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82, and therefore denies the same.

83. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83, and therefore denies the same.

84. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84, and therefore denies the same.

85. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85, and therefore denies the same.

86. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86, and therefore denies the same.

87. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87, and therefore denies the same.

88. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88, and therefore denies the same.

89. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89, and therefore denies the same.

90. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90, and therefore denies the same.

91. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91, and therefore denies the same.

92. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92, and therefore denies the same.

93. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93, and therefore denies the same.

94. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94, and therefore denies the same.

95. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95, and therefore denies the same.

96. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96, and therefore denies the same.

97. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, and therefore denies the same.

98. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98, and therefore denies the same.

99. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99, and therefore denies the same.

100. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100, and therefore denies the same.

101. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101, and therefore denies the same.

102. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102, and therefore denies the same.

103. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103, and therefore denies the same.

104. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104, and therefore denies the same.

105. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105, and therefore denies the same.

106. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106, and therefore denies the same.

107. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107, and therefore denies the same.

108. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108, and therefore denies the same.

109. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109, and therefore denies the same.

110. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110, and therefore denies the same.

111. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111, and therefore denies the same.

112. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112, and therefore denies the same.

113. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113, and therefore denies the same.

114. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114, and therefore denies the same.

115. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115, and therefore denies the same.

116. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116, and therefore denies the same.

117. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117, and therefore denies the same.

118. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118, and therefore denies the same.

119. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119, and therefore denies the same.

120. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120, and therefore denies the same.

121. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121, and therefore denies the same.

122. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122, and therefore denies the same.

123. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123, and therefore denies the same.

124. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124, and therefore denies the same.

125. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125, and therefore denies the same.

126. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126, and therefore denies the same.

127. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127, and therefore denies the same.

128. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128, and therefore denies the same.

129. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129, and therefore denies the same.

130. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130, and therefore denies the same.

131. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131, and therefore denies the same.

132. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132, and therefore denies the same.

133. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133, and therefore denies the same.

134. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134, and therefore denies the same.

135. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135, and therefore denies the same.

136. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136, and therefore denies the same.

137. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137, and therefore denies the same.

138. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138, and therefore denies the same.

139. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139, and therefore denies the same.

140. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140, and therefore denies the same.

141. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141, and therefore denies the same.

142. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142, and therefore denies the same.

143. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143, and therefore denies the same.

144. Apple denies the allegations in Paragraph 144.

145. Apple denies the allegations in Paragraph 145.

146. Apple denies the allegations in Paragraph 146.

SECOND COUNT

(Infringement of the '347 patent)

147. Apple incorporates by reference its responses to Paragraphs 1-146 of this Answer as if fully set forth herein.

148. Apple denies the allegations in Paragraph 148.

149. Apple denies the allegations in Paragraph 149.

150. Apple denies the allegations in Paragraph 150.

151. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 151.

152. Apple denies the allegations in Paragraph 152.

153. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153, and therefore denies the same.

154. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154, and therefore denies the same.

155. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155, and therefore denies the same.

156. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156, and therefore denies the same.

157. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157, and therefore denies the same.

158. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158, and therefore denies the same.

159. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159, and therefore denies the same.

160. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160, and therefore denies the same.

161. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161, and therefore denies the same.

162. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162, and therefore denies the same.

163. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163, and therefore denies the same.

164. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164, and therefore denies the same.

165. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165, and therefore denies the same.

166. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166, and therefore denies the same.

167. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167, and therefore denies the same.

168. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168, and therefore denies the same.

169. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169, and therefore denies the same.

170. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170, and therefore denies the same.

171. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171, and therefore denies the same.

172. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172, and therefore denies the same.

173. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173, and therefore denies the same.

174. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174, and therefore denies the same.

175. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175, and therefore denies the same.

176. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176, and therefore denies the same.

177. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177, and therefore denies the same.

178. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 178, and therefore denies the same.

179. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179, and therefore denies the same.

180. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180, and therefore denies the same.

181. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181, and therefore denies the same.

182. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182, and therefore denies the same.

183. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183, and therefore denies the same.

184. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184, and therefore denies the same.

185. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185, and therefore denies the same.

186. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186, and therefore denies the same.

187. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187, and therefore denies the same.

188. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188, and therefore denies the same.

189. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189, and therefore denies the same.

190. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190, and therefore denies the same.

191. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191, and therefore denies the same.

192. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192, and therefore denies the same.

193. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193, and therefore denies the same.

194. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194, and therefore denies the same.

195. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195, and therefore denies the same.

196. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196, and therefore denies the same.

197. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197, and therefore denies the same.

198. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198, and therefore denies the same.

199. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199, and therefore denies the same.

200. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200, and therefore denies the same.

201. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201, and therefore denies the same.

202. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202, and therefore denies the same.

203. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203, and therefore denies the same.

204. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204, and therefore denies the same.

205. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205, and therefore denies the same.

206. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 206, and therefore denies the same.

207. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207, and therefore denies the same.

208. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208, and therefore denies the same.

209. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209, and therefore denies the same.

210. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210, and therefore denies the same.

211. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211, and therefore denies the same.

212. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212, and therefore denies the same.

213. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213, and therefore denies the same.

214. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214, and therefore denies the same.

215. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215, and therefore denies the same.

216. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216, and therefore denies the same.

217. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217, and therefore denies the same.

218. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218, and therefore denies the same.

219. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219, and therefore denies the same.

220. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220, and therefore denies the same.

221. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221, and therefore denies the same.

222. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222, and therefore denies the same.

223. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223, and therefore denies the same.

224. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 224, and therefore denies the same.

225. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 225, and therefore denies the same.

226. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226, and therefore denies the same.

227. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227, and therefore denies the same.

228. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228, and therefore denies the same.

229. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229, and therefore denies the same.

230. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230, and therefore denies the same.

231. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231, and therefore denies the same.

232. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232, and therefore denies the same.

233. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233, and therefore denies the same.

234. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234, and therefore denies the same.

235. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235, and therefore denies the same.

236. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236, and therefore denies the same.

237. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237, and therefore denies the same.

238. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238, and therefore denies the same.

239. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239, and therefore denies the same.

240. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240, and therefore denies the same.

241. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241, and therefore denies the same.

242. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242, and therefore denies the same.

243. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243, and therefore denies the same.

244. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244, and therefore denies the same.

245. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245, and therefore denies the same.

246. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246, and therefore denies the same.

247. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 247, and therefore denies the same.

248. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248, and therefore denies the same.

249. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249, and therefore denies the same.

250. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250, and therefore denies the same.

251. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 251, and therefore denies the same.

252. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 252, and therefore denies the same.

253. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 253, and therefore denies the same.

254. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254, and therefore denies the same.

255. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 255, and therefore denies the same.

256. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256, and therefore denies the same.

257. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257, and therefore denies the same.

258. Apple denies the allegations in Paragraph 258.

259. Apple denies the allegations in Paragraph 259.

260. Apple denies the allegations in Paragraph 260.

THIRD COUNT

(Infringement of the '181 patent)

261. Apple incorporates by reference its responses to Paragraphs 1-260 of this Answer as if fully set forth herein.

262. Apple denies the allegations in Paragraph 262.

263. Apple denies the allegations in Paragraph 263.

264. Apple denies the allegations in Paragraph 264.

265. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 265.

266. Apple denies the allegations in Paragraph 266.

267. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267, and therefore denies the same.

268. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268, and therefore denies the same.

269. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269, and therefore denies the same.

270. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270, and therefore denies the same.

271. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271, and therefore denies the same.

272. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272, and therefore denies the same.

273. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273, and therefore denies the same.

274. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274, and therefore denies the same.

275. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275, and therefore denies the same.

276. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276, and therefore denies the same.

277. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277, and therefore denies the same.

278. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278, and therefore denies the same.

279. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279, and therefore denies the same.

280. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280, and therefore denies the same.

281. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281, and therefore denies the same.

282. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282, and therefore denies the same.

283. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283, and therefore denies the same.

284. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284, and therefore denies the same.

285. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285, and therefore denies the same.

286. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286, and therefore denies the same.

287. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287, and therefore denies the same.

288. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288, and therefore denies the same.

289. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289, and therefore denies the same.

290. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 290, and therefore denies the same.

291. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291, and therefore denies the same.

292. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292, and therefore denies the same.

293. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293, and therefore denies the same.

294. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294, and therefore denies the same.

295. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295, and therefore denies the same.

296. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296, and therefore denies the same.

297. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297, and therefore denies the same.

298. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298, and therefore denies the same.

299. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299, and therefore denies the same.

300. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300, and therefore denies the same.

301. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301, and therefore denies the same.

302. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302, and therefore denies the same.

303. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 303, and therefore denies the same.

304. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304, and therefore denies the same.

305. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305, and therefore denies the same.

306. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306, and therefore denies the same.

307. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307, and therefore denies the same.

308. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308, and therefore denies the same.

309. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 309, and therefore denies the same.

310. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 310, and therefore denies the same.

311. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311, and therefore denies the same.

312. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312, and therefore denies the same.

313. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313, and therefore denies the same.

314. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314, and therefore denies the same.

315. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315, and therefore denies the same.

316. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316, and therefore denies the same.

317. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 317, and therefore denies the same.

318. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 318, and therefore denies the same.

319. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 319, and therefore denies the same.

320. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320, and therefore denies the same.

321. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321, and therefore denies the same.

322. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 322, and therefore denies the same.

323. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 323, and therefore denies the same.

324. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 324, and therefore denies the same.

325. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325, and therefore denies the same.

326. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326, and therefore denies the same.

327. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327, and therefore denies the same.

328. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 328, and therefore denies the same.

329. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 329, and therefore denies the same.

330. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330, and therefore denies the same.

331. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 331, and therefore denies the same.

332. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 332, and therefore denies the same.

333. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333, and therefore denies the same.

334. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334, and therefore denies the same.

335. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 335, and therefore denies the same.

336. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336, and therefore denies the same.

337. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337, and therefore denies the same.

338. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 338, and therefore denies the same.

339. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339, and therefore denies the same.

340. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 340, and therefore denies the same.

341. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341, and therefore denies the same.

342. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 342, and therefore denies the same.

343. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343, and therefore denies the same.

344. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344, and therefore denies the same.

345. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345, and therefore denies the same.

346. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346, and therefore denies the same.

347. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347, and therefore denies the same.

348. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348, and therefore denies the same.

349. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349, and therefore denies the same.

350. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350, and therefore denies the same.

351. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351, and therefore denies the same.

352. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352, and therefore denies the same.

353. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 353, and therefore denies the same.

354. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 354, and therefore denies the same.

355. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355, and therefore denies the same.

356. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356, and therefore denies the same.

357. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357, and therefore denies the same.

358. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358, and therefore denies the same.

359. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 359, and therefore denies the same.

360. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 360, and therefore denies the same.

361. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 361, and therefore denies the same.

362. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362, and therefore denies the same.

363. Apple denies the allegations in Paragraph 363.

364. Apple denies the allegations in Paragraph 364.

365. Apple denies the allegations in Paragraph 365.

FOURTH COUNT

(Infringement of the '959 patent)

366. Apple incorporates by reference its responses to Paragraphs 1-365 of this Answer as if fully set forth herein.

367. Apple denies the allegations in Paragraph 367.

368. Apple denies the allegations in Paragraph 368.

369. Apple denies the allegations in Paragraph 369.

370. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 370.

371. Apple denies the allegations in Paragraph 371.

372. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372, and therefore denies the same.

373. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 373, and therefore denies the same.

374. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 374, and therefore denies the same.

375. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375, and therefore denies the same.

376. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 376, and therefore denies the same.

377. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377, and therefore denies the same.

378. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 378, and therefore denies the same.

379. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 379, and therefore denies the same.

380. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 380, and therefore denies the same.

381. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381, and therefore denies the same.

382. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382, and therefore denies the same.

383. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383, and therefore denies the same.

384. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384, and therefore denies the same.

385. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385, and therefore denies the same.

386. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386, and therefore denies the same.

387. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387, and therefore denies the same.

388. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388, and therefore denies the same.

389. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389, and therefore denies the same.

390. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390, and therefore denies the same.

391. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391, and therefore denies the same.

392. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 392, and therefore denies the same.

393. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 393, and therefore denies the same.

394. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 394, and therefore denies the same.

395. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395, and therefore denies the same.

396. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396, and therefore denies the same.

397. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397, and therefore denies the same.

398. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 398, and therefore denies the same.

399. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399, and therefore denies the same.

400. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400, and therefore denies the same.

401. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 401, and therefore denies the same.

402. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402, and therefore denies the same.

403. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 403, and therefore denies the same.

404. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404, and therefore denies the same.

405. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405, and therefore denies the same.

406. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406, and therefore denies the same.

407. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407, and therefore denies the same.

408. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 408, and therefore denies the same.

409. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 409, and therefore denies the same.

410. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 410, and therefore denies the same.

411. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 411, and therefore denies the same.

412. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 412, and therefore denies the same.

413. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413, and therefore denies the same.

414. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 414, and therefore denies the same.

415. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 415, and therefore denies the same.

416. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416, and therefore denies the same.

417. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 417, and therefore denies the same.

418. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418, and therefore denies the same.

419. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419, and therefore denies the same.

420. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 420, and therefore denies the same.

421. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 421, and therefore denies the same.

422. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 422, and therefore denies the same.

423. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 423, and therefore denies the same.

424. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 424, and therefore denies the same.

425. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 425, and therefore denies the same.

426. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426, and therefore denies the same.

427. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 427, and therefore denies the same.

428. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 428, and therefore denies the same.

429. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429, and therefore denies the same.

430. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 430, and therefore denies the same.

431. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431, and therefore denies the same.

432. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432, and therefore denies the same.

433. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 433, and therefore denies the same.

434. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 434, and therefore denies the same.

435. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435, and therefore denies the same.

436. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436, and therefore denies the same.

437. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 437, and therefore denies the same.

438. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438, and therefore denies the same.

439. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 439, and therefore denies the same.

440. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 440, and therefore denies the same.

441. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 441, and therefore denies the same.

442. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 442, and therefore denies the same.

443. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443, and therefore denies the same.

444. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444, and therefore denies the same.

445. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445, and therefore denies the same.

446. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446, and therefore denies the same.

447. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 447, and therefore denies the same.

448. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 448, and therefore denies the same.

449. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 449, and therefore denies the same.

450. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450, and therefore denies the same.

451. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451, and therefore denies the same.

452. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 452, and therefore denies the same.

453. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453, and therefore denies the same.

454. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454, and therefore denies the same.

455. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 455, and therefore denies the same.

456. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456, and therefore denies the same.

457. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457, and therefore denies the same.

458. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458, and therefore denies the same.

459. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459, and therefore denies the same.

460. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460, and therefore denies the same.

461. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461, and therefore denies the same.

462. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462, and therefore denies the same.

463. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463, and therefore denies the same.

464. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464, and therefore denies the same.

465. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 465, and therefore denies the same.

466. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466, and therefore denies the same.

467. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 467, and therefore denies the same.

468. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 468, and therefore denies the same.

469. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 469, and therefore denies the same.

470. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 470, and therefore denies the same.

471. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471, and therefore denies the same.

472. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472, and therefore denies the same.

473. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473, and therefore denies the same.

474. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474, and therefore denies the same.

475. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475, and therefore denies the same.

476. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476, and therefore denies the same.

477. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477, and therefore denies the same.

478. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478, and therefore denies the same.

479. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479, and therefore denies the same.

480. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480, and therefore denies the same.

481. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481, and therefore denies the same.

482. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482, and therefore denies the same.

483. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 483, and therefore denies the same.

484. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484, and therefore denies the same.

485. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 485, and therefore denies the same.

486. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 486, and therefore denies the same.

487. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 487, and therefore denies the same.

488. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 488, and therefore denies the same.

489. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489, and therefore denies the same.

490. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490, and therefore denies the same.

491. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 491, and therefore denies the same.

492. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 492, and therefore denies the same.

493. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493, and therefore denies the same.

494. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494, and therefore denies the same.

495. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 495, and therefore denies the same.

496. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 496, and therefore denies the same.

497. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 497, and therefore denies the same.

498. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 498, and therefore denies the same.

499. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 499, and therefore denies the same.

500. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500, and therefore denies the same.

501. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501, and therefore denies the same.

502. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502, and therefore denies the same.

503. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503, and therefore denies the same.

504. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504, and therefore denies the same.

505. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505, and therefore denies the same.

506. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 506, and therefore denies the same.

507. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 507, and therefore denies the same.

508. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508, and therefore denies the same.

509. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 509, and therefore denies the same.

510. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 510, and therefore denies the same.

511. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 511, and therefore denies the same.

512. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 512, and therefore denies the same.

513. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 513, and therefore denies the same.

514. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 514, and therefore denies the same.

515. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 515, and therefore denies the same.

516. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 516, and therefore denies the same.

517. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 517, and therefore denies the same.

518. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 518, and therefore denies the same.

519. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 519, and therefore denies the same.

520. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520, and therefore denies the same.

521. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 521, and therefore denies the same.

522. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 522, and therefore denies the same.

523. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 523, and therefore denies the same.

524. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524, and therefore denies the same.

525. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525, and therefore denies the same.

526. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 526, and therefore denies the same.

527. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527, and therefore denies the same.

528. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 528, and therefore denies the same.

529. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 529, and therefore denies the same.

530. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 530, and therefore denies the same.

531. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531, and therefore denies the same.

532. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532, and therefore denies the same.

533. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 533, and therefore denies the same.

534. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534, and therefore denies the same.

535. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 535, and therefore denies the same.

536. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 536, and therefore denies the same.

537. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 537, and therefore denies the same.

538. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 538, and therefore denies the same.

539. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 539, and therefore denies the same.

540. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 540, and therefore denies the same.

541. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541, and therefore denies the same.

542. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542, and therefore denies the same.

543. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543, and therefore denies the same.

544. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544, and therefore denies the same.

545. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 545, and therefore denies the same.

546. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 546, and therefore denies the same.

547. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 547, and therefore denies the same.

548. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548, and therefore denies the same.

549. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 549, and therefore denies the same.

550. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 550, and therefore denies the same.

551. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551, and therefore denies the same.

552. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 552, and therefore denies the same.

553. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553, and therefore denies the same.

554. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554, and therefore denies the same.

555. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 555, and therefore denies the same.

556. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556, and therefore denies the same.

557. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557, and therefore denies the same.

558. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558, and therefore denies the same.

559. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559, and therefore denies the same.

560. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 560, and therefore denies the same.

561. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 561, and therefore denies the same.

562. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 562, and therefore denies the same.

563. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 563, and therefore denies the same.

564. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564, and therefore denies the same.

565. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 565, and therefore denies the same.

566. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566, and therefore denies the same.

567. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567, and therefore denies the same.

568. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568, and therefore denies the same.

569. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569, and therefore denies the same.

570. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570, and therefore denies the same.

571. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 571, and therefore denies the same.

572. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572, and therefore denies the same.

573. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 573, and therefore denies the same.

574. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 574, and therefore denies the same.

575. Apple denies the allegations in Paragraph 575.

576. Apple denies the allegations in Paragraph 576.

577. Apple denies the allegations in Paragraph 577.

FIFTH COUNT

(Infringement of the '271 patent)

578. Apple incorporates by reference its responses to Paragraphs 1-577 of this Answer as if fully set forth herein.

579. Apple denies the allegations in Paragraph 579.

580. Apple denies the allegations in Paragraph 580.

581. Apple denies the allegations in Paragraph 581.

582. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 582.

583. Apple denies the allegations in Paragraph 583.

584. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584, and therefore denies the same.

585. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 585, and therefore denies the same.

586. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586, and therefore denies the same.

587. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587, and therefore denies the same.

588. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588, and therefore denies the same.

589. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589, and therefore denies the same.

590. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 590, and therefore denies the same.

591. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 591, and therefore denies the same.

592. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592, and therefore denies the same.

593. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593, and therefore denies the same.

594. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594, and therefore denies the same.

595. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595, and therefore denies the same.

596. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596, and therefore denies the same.

597. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597, and therefore denies the same.

598. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598, and therefore denies the same.

599. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 599, and therefore denies the same.

600. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600, and therefore denies the same.

601. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601, and therefore denies the same.

602. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602, and therefore denies the same.

603. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603, and therefore denies the same.

604. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604, and therefore denies the same.

605. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605, and therefore denies the same.

606. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 606, and therefore denies the same.

607. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607, and therefore denies the same.

608. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608, and therefore denies the same.

609. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609, and therefore denies the same.

610. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610, and therefore denies the same.

611. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 611, and therefore denies the same.

612. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 612, and therefore denies the same.

613. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613, and therefore denies the same.

614. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614, and therefore denies the same.

615. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615, and therefore denies the same.

616. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616, and therefore denies the same.

617. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617, and therefore denies the same.

618. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618, and therefore denies the same.

619. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619, and therefore denies the same.

620. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620, and therefore denies the same.

621. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621, and therefore denies the same.

622. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622, and therefore denies the same.

623. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623, and therefore denies the same.

624. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624, and therefore denies the same.

625. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625, and therefore denies the same.

626. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626, and therefore denies the same.

627. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627, and therefore denies the same.

628. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628, and therefore denies the same.

629. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629, and therefore denies the same.

630. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630, and therefore denies the same.

631. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631, and therefore denies the same.

632. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632, and therefore denies the same.

633. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633, and therefore denies the same.

634. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634, and therefore denies the same.

635. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635, and therefore denies the same.

636. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636, and therefore denies the same.

637. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637, and therefore denies the same.

638. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638, and therefore denies the same.

639. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639, and therefore denies the same.

640. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640, and therefore denies the same.

641. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641, and therefore denies the same.

642. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642, and therefore denies the same.

643. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643, and therefore denies the same.

644. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644, and therefore denies the same.

645. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645, and therefore denies the same.

646. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646, and therefore denies the same.

647. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647, and therefore denies the same.

648. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648, and therefore denies the same.

649. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649, and therefore denies the same.

650. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650, and therefore denies the same.

651. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651, and therefore denies the same.

652. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 652, and therefore denies the same.

653. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653, and therefore denies the same.

654. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 654, and therefore denies the same.

655. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655, and therefore denies the same.

656. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 656, and therefore denies the same.

657. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657, and therefore denies the same.

658. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658, and therefore denies the same.

659. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659, and therefore denies the same.

660. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 660, and therefore denies the same.

661. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 661, and therefore denies the same.

662. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662, and therefore denies the same.

663. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663, and therefore denies the same.

664. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 664, and therefore denies the same.

665. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 665, and therefore denies the same.

666. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666, and therefore denies the same.

667. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667, and therefore denies the same.

668. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668, and therefore denies the same.

669. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 669, and therefore denies the same.

670. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 670, and therefore denies the same.

671. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 671, and therefore denies the same.

672. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 672, and therefore denies the same.

673. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 673, and therefore denies the same.

674. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 674, and therefore denies the same.

675. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 675, and therefore denies the same.

676. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676, and therefore denies the same.

677. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677, and therefore denies the same.

678. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 678, and therefore denies the same.

679. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679, and therefore denies the same.

680. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680, and therefore denies the same.

681. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681, and therefore denies the same.

682. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682, and therefore denies the same.

683. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683, and therefore denies the same.

684. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 684, and therefore denies the same.

685. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 685, and therefore denies the same.

686. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 686, and therefore denies the same.

687. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687, and therefore denies the same.

688. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 688, and therefore denies the same.

689. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689, and therefore denies the same.

690. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690, and therefore denies the same.

691. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691, and therefore denies the same.

692. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 692, and therefore denies the same.

693. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693, and therefore denies the same.

694. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 694, and therefore denies the same.

695. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695, and therefore denies the same.

696. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696, and therefore denies the same.

697. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697, and therefore denies the same.

698. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 698, and therefore denies the same.

699. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 699, and therefore denies the same.

700. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 700, and therefore denies the same.

701. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 701, and therefore denies the same.

702. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 702, and therefore denies the same.

703. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 703, and therefore denies the same.

704. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 704, and therefore denies the same.

705. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 705, and therefore denies the same.

706. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 706, and therefore denies the same.

707. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 707, and therefore denies the same.

708. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 708, and therefore denies the same.

709. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 709, and therefore denies the same.

710. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 710, and therefore denies the same.

711. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 711, and therefore denies the same.

712. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 712, and therefore denies the same.

713. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 713, and therefore denies the same.

714. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 714, and therefore denies the same.

715. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 715, and therefore denies the same.

716. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 716, and therefore denies the same.

717. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 717, and therefore denies the same.

718. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718, and therefore denies the same.

719. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 719, and therefore denies the same.

720. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 720, and therefore denies the same.

721. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 721, and therefore denies the same.

722. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 722, and therefore denies the same.

723. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 723, and therefore denies the same.

724. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724, and therefore denies the same.

725. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725, and therefore denies the same.

726. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 726, and therefore denies the same.

727. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 727, and therefore denies the same.

728. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 728, and therefore denies the same.

729. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 729, and therefore denies the same.

730. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 730, and therefore denies the same.

731. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731, and therefore denies the same.

732. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 732, and therefore denies the same.

733. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 733, and therefore denies the same.

734. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734, and therefore denies the same.

735. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 735, and therefore denies the same.

736. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 736, and therefore denies the same.

737. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737, and therefore denies the same.

738. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738, and therefore denies the same.

739. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739, and therefore denies the same.

740. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740, and therefore denies the same.

741. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741, and therefore denies the same.

742. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 742, and therefore denies the same.

743. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743, and therefore denies the same.

744. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744, and therefore denies the same.

745. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745, and therefore denies the same.

746. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 746, and therefore denies the same.

747. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 747, and therefore denies the same.

748. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 748, and therefore denies the same.

749. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749, and therefore denies the same.

750. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750, and therefore denies the same.

751. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 751, and therefore denies the same.

752. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 752, and therefore denies the same.

753. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 753, and therefore denies the same.

754. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 754, and therefore denies the same.

755. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 755, and therefore denies the same.

756. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 756, and therefore denies the same.

757. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 757, and therefore denies the same.

758. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 758, and therefore denies the same.

759. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 759, and therefore denies the same.

760. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 760, and therefore denies the same.

761. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 761, and therefore denies the same.

762. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 762, and therefore denies the same.

763. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 763, and therefore denies the same.

764. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 764, and therefore denies the same.

765. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 765, and therefore denies the same.

766. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 766, and therefore denies the same.

767. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 767, and therefore denies the same.

768. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 768, and therefore denies the same.

769. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 769, and therefore denies the same.

770. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 770, and therefore denies the same.

771. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 771, and therefore denies the same.

772. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 772, and therefore denies the same.

773. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 773, and therefore denies the same.

774. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 774, and therefore denies the same.

775. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 775, and therefore denies the same.

776. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 776, and therefore denies the same.

777. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 777, and therefore denies the same.

778. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 778, and therefore denies the same.

779. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 779, and therefore denies the same.

780. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 780, and therefore denies the same.

781. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 781, and therefore denies the same.

782. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 782, and therefore denies the same.

783. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 783, and therefore denies the same.

784. Apple denies the allegations in Paragraph 784.

785. Apple denies the allegations in Paragraph 785.

786. Apple denies the allegations in Paragraph 786.

SIXTH COUNT

(Infringement of the '321 patent)

787. Apple incorporates by reference its responses to Paragraphs 1-786 of this Answer as if fully set forth herein.

788. Apple denies the allegations in Paragraph 788.

789. Apple denies the allegations in Paragraph 789.

790. Apple denies the allegations in Paragraph 790.

791. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 791.

792. Apple denies the allegations in Paragraph 792.

793. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 793, and therefore denies the same.

794. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 794, and therefore denies the same.

795. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 795, and therefore denies the same.

796. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 796, and therefore denies the same.

797. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 797, and therefore denies the same.

798. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 798, and therefore denies the same.

799. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 799, and therefore denies the same.

800. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 800, and therefore denies the same.

801. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 801, and therefore denies the same.

802. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 802, and therefore denies the same.

803. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 803, and therefore denies the same.

804. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 804, and therefore denies the same.

805. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 805, and therefore denies the same.

806. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 806, and therefore denies the same.

807. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 807, and therefore denies the same.

808. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 808, and therefore denies the same.

809. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 809, and therefore denies the same.

810. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 810, and therefore denies the same.

811. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 811, and therefore denies the same.

812. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 812, and therefore denies the same.

813. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 813, and therefore denies the same.

814. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 814, and therefore denies the same.

815. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 815, and therefore denies the same.

816. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 816, and therefore denies the same.

817. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 817, and therefore denies the same.

818. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 818, and therefore denies the same.

819. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 819, and therefore denies the same.

820. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 820, and therefore denies the same.

821. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 821, and therefore denies the same.

822. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 822, and therefore denies the same.

823. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 823, and therefore denies the same.

824. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 824, and therefore denies the same.

825. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 825, and therefore denies the same.

826. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 826, and therefore denies the same.

827. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 827, and therefore denies the same.

828. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 828, and therefore denies the same.

829. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 829, and therefore denies the same.

830. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 830, and therefore denies the same.

831. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 831, and therefore denies the same.

832. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 832, and therefore denies the same.

833. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 833, and therefore denies the same.

834. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 834, and therefore denies the same.

835. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 835, and therefore denies the same.

836. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 836, and therefore denies the same.

837. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 837, and therefore denies the same.

838. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 838, and therefore denies the same.

839. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 839, and therefore denies the same.

840. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 840, and therefore denies the same.

841. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 841, and therefore denies the same.

842. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 842, and therefore denies the same.

843. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 843, and therefore denies the same.

844. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 844, and therefore denies the same.

845. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 845, and therefore denies the same.

846. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 846, and therefore denies the same.

847. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 847, and therefore denies the same.

848. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 848, and therefore denies the same.

849. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 849, and therefore denies the same.

850. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 850, and therefore denies the same.

851. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 851, and therefore denies the same.

852. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 852, and therefore denies the same.

853. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 853, and therefore denies the same.

854. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 854, and therefore denies the same.

855. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 855, and therefore denies the same.

856. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 856, and therefore denies the same.

857. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 857, and therefore denies the same.

858. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 858, and therefore denies the same.

859. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 859, and therefore denies the same.

860. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 860, and therefore denies the same.

861. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 861, and therefore denies the same.

862. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 862, and therefore denies the same.

863. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 863, and therefore denies the same.

864. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 864, and therefore denies the same.

865. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 865, and therefore denies the same.

866. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 866, and therefore denies the same.

867. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 867, and therefore denies the same.

868. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 868, and therefore denies the same.

869. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 869, and therefore denies the same.

870. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 870, and therefore denies the same.

871. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 871, and therefore denies the same.

872. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 872, and therefore denies the same.

873. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 873, and therefore denies the same.

874. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 874, and therefore denies the same.

875. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 875, and therefore denies the same.

876. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 876, and therefore denies the same.

877. Apple denies the allegations in Paragraph 877.

878. Apple denies the allegations in Paragraph 878.

879. Apple denies the allegations in Paragraph 879.

SEVENTH COUNT

(Infringement of the '143 patent)

880. Apple incorporates by reference its responses to Paragraphs 1-879 of this Answer as if fully set forth herein.

881. Apple denies the allegations in Paragraph 881.

882. Apple denies the allegations in Paragraph 882.

883. Apple denies the allegations in Paragraph 883.

884. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 884.

885. Apple denies the allegations in Paragraph 885.

886. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 886, and therefore denies the same.

887. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 887, and therefore denies the same.

888. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 888, and therefore denies the same.

889. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 889, and therefore denies the same.

890. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 890, and therefore denies the same.

891. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 891, and therefore denies the same.

892. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 892, and therefore denies the same.

893. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 893, and therefore denies the same.

894. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 894, and therefore denies the same.

895. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 895, and therefore denies the same.

896. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 896, and therefore denies the same.

897. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 897, and therefore denies the same.

898. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 898, and therefore denies the same.

899. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 899, and therefore denies the same.

900. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 900, and therefore denies the same.

901. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 901, and therefore denies the same.

902. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 902, and therefore denies the same.

903. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 903, and therefore denies the same.

904. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 904, and therefore denies the same.

905. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 905, and therefore denies the same.

906. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 906, and therefore denies the same.

907. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 907, and therefore denies the same.

908. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 908, and therefore denies the same.

909. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 909, and therefore denies the same.

910. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 910, and therefore denies the same.

911. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 911, and therefore denies the same.

912. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 912, and therefore denies the same.

913. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 913, and therefore denies the same.

914. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 914, and therefore denies the same.

915. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 915, and therefore denies the same.

916. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 916, and therefore denies the same.

917. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 917, and therefore denies the same.

918. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 918, and therefore denies the same.

919. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 919, and therefore denies the same.

920. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 920, and therefore denies the same.

921. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 921, and therefore denies the same.

922. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 922, and therefore denies the same.

923. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 923, and therefore denies the same.

924. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 924, and therefore denies the same.

925. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 925, and therefore denies the same.

926. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 926, and therefore denies the same.

927. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 927, and therefore denies the same.

928. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 928, and therefore denies the same.

929. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 929, and therefore denies the same.

930. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 930, and therefore denies the same.

931. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 931, and therefore denies the same.

932. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 932, and therefore denies the same.

933. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 933, and therefore denies the same.

934. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 934, and therefore denies the same.

935. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 935, and therefore denies the same.

936. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 936, and therefore denies the same.

937. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 937, and therefore denies the same.

938. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 938, and therefore denies the same.

939. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 939, and therefore denies the same.

940. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 940, and therefore denies the same.

941. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 941, and therefore denies the same.

942. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 942, and therefore denies the same.

943. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 943, and therefore denies the same.

944. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 944, and therefore denies the same.

945. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 945, and therefore denies the same.

946. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 946, and therefore denies the same.

947. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 947, and therefore denies the same.

948. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 948, and therefore denies the same.

949. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 949, and therefore denies the same.

950. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 950, and therefore denies the same.

951. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 951, and therefore denies the same.

952. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 952, and therefore denies the same.

953. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 953, and therefore denies the same.

954. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 954, and therefore denies the same.

955. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 955, and therefore denies the same.

956. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 956, and therefore denies the same.

957. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 957, and therefore denies the same.

958. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 958, and therefore denies the same.

959. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 959, and therefore denies the same.

960. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 960, and therefore denies the same.

961. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 961, and therefore denies the same.

962. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 962, and therefore denies the same.

963. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 963, and therefore denies the same.

964. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 964, and therefore denies the same.

965. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 965, and therefore denies the same.

966. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 966, and therefore denies the same.

967. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 967, and therefore denies the same.

968. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 968, and therefore denies the same.

969. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 969, and therefore denies the same.

970. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 970, and therefore denies the same.

971. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 971, and therefore denies the same.

972. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 972, and therefore denies the same.

973. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 973, and therefore denies the same.

974. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 974, and therefore denies the same.

975. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 975, and therefore denies the same.

976. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 976, and therefore denies the same.

977. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 977, and therefore denies the same.

978. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 978, and therefore denies the same.

979. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 979, and therefore denies the same.

980. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 980, and therefore denies the same.

981. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 981, and therefore denies the same.

982. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 982, and therefore denies the same.

983. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 983, and therefore denies the same.

984. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 984, and therefore denies the same.

985. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 985, and therefore denies the same.

986. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 986, and therefore denies the same.

987. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 987, and therefore denies the same.

988. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 988, and therefore denies the same.

989. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 989, and therefore denies the same.

990. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 990, and therefore denies the same.

991. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 991, and therefore denies the same.

992. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 992, and therefore denies the same.

993. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 993, and therefore denies the same.

994. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 994, and therefore denies the same.

995. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 995, and therefore denies the same.

996. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 996, and therefore denies the same.

997. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 997, and therefore denies the same.

998. Apple denies the allegations in Paragraph 998.

999. Apple denies the allegations in Paragraph 999.

1000. Apple denies the allegations in Paragraph 1000.

EIGHTH COUNT

(Infringement of the '850 patent)

1001. Apple incorporates by reference its responses to Paragraphs 1-1000 of this Answer as if fully set forth herein.

1002. Apple denies the allegations in Paragraph 1002.

1003. Apple denies the allegations in Paragraph 1003.

1004. Apple denies the allegations in Paragraph 1004.

1005. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1005.

1006. Apple denies the allegations in Paragraph 1006.

1007. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1007, and therefore denies the same.

1008. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1008, and therefore denies the same.

1009. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1009, and therefore denies the same.

1010. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1010, and therefore denies the same.

1011. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1011, and therefore denies the same.

1012. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1012, and therefore denies the same.

1013. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1013, and therefore denies the same.

1014. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1014, and therefore denies the same.

1015. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1015, and therefore denies the same.

1016. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1016, and therefore denies the same.

1017. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1017, and therefore denies the same.

1018. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1018, and therefore denies the same.

1019. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1019, and therefore denies the same.

1020. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1020, and therefore denies the same.

1021. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1021, and therefore denies the same.

1022. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1022, and therefore denies the same.

1023. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1023, and therefore denies the same.

1024. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1024, and therefore denies the same.

1025. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1025, and therefore denies the same.

1026. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1026, and therefore denies the same.

1027. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1027, and therefore denies the same.

1028. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1028, and therefore denies the same.

1029. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1029, and therefore denies the same.

1030. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1030, and therefore denies the same.

1031. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1031, and therefore denies the same.

1032. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1032, and therefore denies the same.

1033. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1033, and therefore denies the same.

1034. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1034, and therefore denies the same.

1035. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1035, and therefore denies the same.

1036. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1036, and therefore denies the same.

1037. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1037, and therefore denies the same.

1038. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1038, and therefore denies the same.

1039. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1039, and therefore denies the same.

1040. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1040, and therefore denies the same.

1041. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1041, and therefore denies the same.

1042. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1042, and therefore denies the same.

1043. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1043, and therefore denies the same.

1044. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1044, and therefore denies the same.

1045. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1045, and therefore denies the same.

1046. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1046, and therefore denies the same.

1047. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1047, and therefore denies the same.

1048. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1048, and therefore denies the same.

1049. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1049, and therefore denies the same.

1050. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1050, and therefore denies the same.

1051. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1051, and therefore denies the same.

1052. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1052, and therefore denies the same.

1053. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1053, and therefore denies the same.

1054. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1054, and therefore denies the same.

1055. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1055, and therefore denies the same.

1056. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1056, and therefore denies the same.

1057. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1057, and therefore denies the same.

1058. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1058, and therefore denies the same.

1059. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1059, and therefore denies the same.

1060. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1060, and therefore denies the same.

1061. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1061, and therefore denies the same.

1062. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1062, and therefore denies the same.

1063. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1063, and therefore denies the same.

1064. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1064, and therefore denies the same.

1065. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1065, and therefore denies the same.

1066. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1066, and therefore denies the same.

1067. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1067, and therefore denies the same.

1068. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1068, and therefore denies the same.

1069. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1069, and therefore denies the same.

1070. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1070, and therefore denies the same.

1071. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1071, and therefore denies the same.

1072. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1072, and therefore denies the same.

1073. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1073, and therefore denies the same.

1074. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1074, and therefore denies the same.

1075. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1075, and therefore denies the same.

1076. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1076, and therefore denies the same.

1077. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1077, and therefore denies the same.

1078. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1078, and therefore denies the same.

1079. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1079, and therefore denies the same.

1080. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1080, and therefore denies the same.

1081. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1081, and therefore denies the same.

1082. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1082, and therefore denies the same.

1083. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1083, and therefore denies the same.

1084. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1084, and therefore denies the same.

1085. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1085, and therefore denies the same.

1086. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1086, and therefore denies the same.

1087. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1087, and therefore denies the same.

1088. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1088, and therefore denies the same.

1089. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1089, and therefore denies the same.

1090. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1090, and therefore denies the same.

1091. Apple denies the allegations in Paragraph 1091.

1092. Apple denies the allegations in Paragraph 1092.

1093. Apple denies the allegations in Paragraph 1093.

NINTH COUNT

(Infringement of the '679 patent)

1094. Apple incorporates by reference its responses to Paragraphs 1-1093 of this Answer as if fully set forth herein.

1095. Apple denies the allegations in Paragraph 1095.

1096. Apple denies the allegations in Paragraph 1096.

1097. Apple denies the allegations in Paragraph 1097.

1098. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1098.

1099. Apple denies the allegations in Paragraph 1099.

1100. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1100, and therefore denies the same.

1101. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1101, and therefore denies the same.

1102. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1102, and therefore denies the same.

1103. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1103, and therefore denies the same.

1104. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1104, and therefore denies the same.

1105. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1105, and therefore denies the same.

1106. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1106, and therefore denies the same.

1107. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1107, and therefore denies the same.

1108. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1108, and therefore denies the same.

1109. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1109, and therefore denies the same.

1110. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1110, and therefore denies the same.

1111. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1111, and therefore denies the same.

1112. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1112, and therefore denies the same.

1113. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1113, and therefore denies the same.

1114. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1114, and therefore denies the same.

1115. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1115, and therefore denies the same.

1116. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1116, and therefore denies the same.

1117. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1117, and therefore denies the same.

1118. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1118, and therefore denies the same.

1119. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1119, and therefore denies the same.

1120. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1120, and therefore denies the same.

1121. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1121, and therefore denies the same.

1122. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1122, and therefore denies the same.

1123. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1123, and therefore denies the same.

1124. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1124, and therefore denies the same.

1125. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1125, and therefore denies the same.

1126. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1126, and therefore denies the same.

1127. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1127, and therefore denies the same.

1128. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1128, and therefore denies the same.

1129. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1129, and therefore denies the same.

1130. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1130, and therefore denies the same.

1131. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1131, and therefore denies the same.

1132. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1132, and therefore denies the same.

1133. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1133, and therefore denies the same.

1134. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1134, and therefore denies the same.

1135. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1135, and therefore denies the same.

1136. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1136, and therefore denies the same.

1137. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1137, and therefore denies the same.

1138. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1138, and therefore denies the same.

1139. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1139, and therefore denies the same.

1140. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1140, and therefore denies the same.

1141. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1141, and therefore denies the same.

1142. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1142, and therefore denies the same.

1143. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1143, and therefore denies the same.

1144. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1144, and therefore denies the same.

1145. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1145, and therefore denies the same.

1146. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1146, and therefore denies the same.

1147. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1147, and therefore denies the same.

1148. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1148, and therefore denies the same.

1149. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1149, and therefore denies the same.

1150. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1150, and therefore denies the same.

1151. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1151, and therefore denies the same.

1152. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1152, and therefore denies the same.

1153. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1153, and therefore denies the same.

1154. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1154, and therefore denies the same.

1155. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1155, and therefore denies the same.

1156. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1156, and therefore denies the same.

1157. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1157, and therefore denies the same.

1158. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1158, and therefore denies the same.

1159. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1159, and therefore denies the same.

1160. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1160, and therefore denies the same.

1161. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1161, and therefore denies the same.

1162. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1162, and therefore denies the same.

1163. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1163, and therefore denies the same.

1164. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1164, and therefore denies the same.

1165. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1165, and therefore denies the same.

1166. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1166, and therefore denies the same.

1167. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1167, and therefore denies the same.

1168. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1168, and therefore denies the same.

1169. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1169, and therefore denies the same.

1170. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1170, and therefore denies the same.

1171. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1171, and therefore denies the same.

1172. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1172, and therefore denies the same.

1173. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1173, and therefore denies the same.

1174. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1174, and therefore denies the same.

1175. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1175, and therefore denies the same.

1176. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1176, and therefore denies the same.

1177. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1177, and therefore denies the same.

1178. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1178, and therefore denies the same.

1179. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1179, and therefore denies the same.

1180. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1180, and therefore denies the same.

1181. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1181, and therefore denies the same.

1182. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1182, and therefore denies the same.

1183. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1183, and therefore denies the same.

1184. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1184, and therefore denies the same.

1185. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1185, and therefore denies the same.

1186. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1186, and therefore denies the same.

1187. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1187, and therefore denies the same.

1188. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1188, and therefore denies the same.

1189. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1189, and therefore denies the same.

1190. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1190, and therefore denies the same.

1191. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1191, and therefore denies the same.

1192. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1192, and therefore denies the same.

1193. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1193, and therefore denies the same.

1194. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1194, and therefore denies the same.

1195. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1195, and therefore denies the same.

1196. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1196, and therefore denies the same.

1197. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1197, and therefore denies the same.

1198. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1198, and therefore denies the same.

1199. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1199, and therefore denies the same.

1200. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1200, and therefore denies the same.

1201. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1201, and therefore denies the same.

1202. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1202, and therefore denies the same.

1203. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1203, and therefore denies the same.

1204. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1204, and therefore denies the same.

1205. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1205, and therefore denies the same.

1206. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1206, and therefore denies the same.

1207. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1207, and therefore denies the same.

1208. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1208, and therefore denies the same.

1209. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1209, and therefore denies the same.

1210. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1210, and therefore denies the same.

1211. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1211, and therefore denies the same.

1212. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1212, and therefore denies the same.

1213. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1213, and therefore denies the same.

1214. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1214, and therefore denies the same.

1215. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1215, and therefore denies the same.

1216. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1216, and therefore denies the same.

1217. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1217, and therefore denies the same.

1218. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1218, and therefore denies the same.

1219. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1219, and therefore denies the same.

1220. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1220, and therefore denies the same.

1221. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1221, and therefore denies the same.

1222. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1222, and therefore denies the same.

1223. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1223, and therefore denies the same.

1224. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1224, and therefore denies the same.

1225. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1225, and therefore denies the same.

1226. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1226, and therefore denies the same.

1227. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1227, and therefore denies the same.

1228. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1228, and therefore denies the same.

1229. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1229, and therefore denies the same.

1230. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1230, and therefore denies the same.

1231. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1231, and therefore denies the same.

1232. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1232, and therefore denies the same.

1233. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1233, and therefore denies the same.

1234. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1234, and therefore denies the same.

1235. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1235, and therefore denies the same.

1236. Apple denies the allegations in Paragraph 1236.

1237. Apple denies the allegations in Paragraph 1237.

1238. Apple denies the allegations in Paragraph 1238.

TENTH COUNT

(Infringement of the '045 patent)

1239. Apple incorporates by reference its responses to Paragraphs 1-1238 of this Answer as if fully set forth herein.

1240. Apple denies the allegations in Paragraph 1240.

1241. Apple denies the allegations in Paragraph 1241.

1242. Apple denies the allegations in Paragraph 1242.

1243. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1243.

1244. Apple denies the allegations in Paragraph 1244.

1245. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1245, and therefore denies the same.

1246. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1246, and therefore denies the same.

1247. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1247, and therefore denies the same.

1248. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1248, and therefore denies the same.

1249. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1249, and therefore denies the same.

1250. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1250, and therefore denies the same.

1251. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1251, and therefore denies the same.

1252. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1252, and therefore denies the same.

1253. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1253, and therefore denies the same.

1254. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1254, and therefore denies the same.

1255. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1255, and therefore denies the same.

1256. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1256, and therefore denies the same.

1257. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1257, and therefore denies the same.

1258. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1258, and therefore denies the same.

1259. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1259, and therefore denies the same.

1260. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1260, and therefore denies the same.

1261. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1261, and therefore denies the same.

1262. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1262, and therefore denies the same.

1263. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1263, and therefore denies the same.

1264. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1264, and therefore denies the same.

1265. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1265, and therefore denies the same.

1266. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1266, and therefore denies the same.

1267. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1267, and therefore denies the same.

1268. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1268, and therefore denies the same.

1269. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1269, and therefore denies the same.

1270. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1270, and therefore denies the same.

1271. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1271, and therefore denies the same.

1272. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1272, and therefore denies the same.

1273. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1273, and therefore denies the same.

1274. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1274, and therefore denies the same.

1275. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1275, and therefore denies the same.

1276. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1276, and therefore denies the same.

1277. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1277, and therefore denies the same.

1278. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1278, and therefore denies the same.

1279. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1279, and therefore denies the same.

1280. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1280, and therefore denies the same.

1281. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1281, and therefore denies the same.

1282. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1282, and therefore denies the same.

1283. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1283, and therefore denies the same.

1284. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1284, and therefore denies the same.

1285. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1285, and therefore denies the same.

1286. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1286, and therefore denies the same.

1287. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1287, and therefore denies the same.

1288. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1288, and therefore denies the same.

1289. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1289, and therefore denies the same.

1290. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1290, and therefore denies the same.

1291. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1291, and therefore denies the same.

1292. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1292, and therefore denies the same.

1293. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1293, and therefore denies the same.

1294. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1294, and therefore denies the same.

1295. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1295, and therefore denies the same.

1296. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1296, and therefore denies the same.

1297. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1297, and therefore denies the same.

1298. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1298, and therefore denies the same.

1299. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1299, and therefore denies the same.

1300. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1300, and therefore denies the same.

1301. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1301, and therefore denies the same.

1302. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1302, and therefore denies the same.

1303. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1303, and therefore denies the same.

1304. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1304, and therefore denies the same.

1305. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1305, and therefore denies the same.

1306. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1306, and therefore denies the same.

1307. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1307, and therefore denies the same.

1308. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1308, and therefore denies the same.

1309. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1309, and therefore denies the same.

1310. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1310, and therefore denies the same.

1311. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1311, and therefore denies the same.

1312. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1312, and therefore denies the same.

1313. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1313, and therefore denies the same.

1314. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1314, and therefore denies the same.

1315. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1315, and therefore denies the same.

1316. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1316, and therefore denies the same.

1317. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1317, and therefore denies the same.

1318. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1318, and therefore denies the same.

1319. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1319, and therefore denies the same.

1320. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1320, and therefore denies the same.

1321. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1321, and therefore denies the same.

1322. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1322, and therefore denies the same.

1323. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1323, and therefore denies the same.

1324. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1324, and therefore denies the same.

1325. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1325, and therefore denies the same.

1326. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1326, and therefore denies the same.

1327. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1327, and therefore denies the same.

1328. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1328, and therefore denies the same.

1329. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1329, and therefore denies the same.

1330. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1330, and therefore denies the same.

1331. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1331, and therefore denies the same.

1332. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1332, and therefore denies the same.

1333. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1333, and therefore denies the same.

1334. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1334, and therefore denies the same.

1335. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1335, and therefore denies the same.

1336. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1336, and therefore denies the same.

1337. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1337, and therefore denies the same.

1338. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1338, and therefore denies the same.

1339. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1339, and therefore denies the same.

1340. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1340, and therefore denies the same.

1341. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1341, and therefore denies the same.

1342. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1342, and therefore denies the same.

1343. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1343, and therefore denies the same.

1344. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1344, and therefore denies the same.

1345. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1345, and therefore denies the same.

1346. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1346, and therefore denies the same.

1347. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1347, and therefore denies the same.

1348. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1348, and therefore denies the same.

1349. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1349, and therefore denies the same.

1350. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1350, and therefore denies the same.

1351. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1351, and therefore denies the same.

1352. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1352, and therefore denies the same.

1353. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1353, and therefore denies the same.

1354. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1354, and therefore denies the same.

1355. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1355, and therefore denies the same.

1356. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1356, and therefore denies the same.

1357. Apple denies the allegations in Paragraph 1357.

1358. Apple denies the allegations in Paragraph 1358.

1359. Apple denies the allegations in Paragraph 1359.

ELEVENTH COUNT

(Infringement of the '860 patent)

1360. Apple incorporates by reference its responses to Paragraphs 1-1359 of this Answer as if fully set forth herein.

1361. Apple denies the allegations in Paragraph 1361.

1362. Apple denies the allegations in Paragraph 1362.

1363. Apple denies the allegations in Paragraph 1363.

1364. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1364.

1365. Apple denies the allegations in Paragraph 1365.

1366. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1366, and therefore denies the same.

1367. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1367, and therefore denies the same.

1368. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1368, and therefore denies the same.

1369. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1369, and therefore denies the same.

1370. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1370, and therefore denies the same.

1371. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1371, and therefore denies the same.

1372. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1372, and therefore denies the same.

1373. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1373, and therefore denies the same.

1374. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1374, and therefore denies the same.

1375. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1375, and therefore denies the same.

1376. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1376, and therefore denies the same.

1377. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1377, and therefore denies the same.

1378. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1378, and therefore denies the same.

1379. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1379, and therefore denies the same.

1380. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1380, and therefore denies the same.

1381. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1381, and therefore denies the same.

1382. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1382, and therefore denies the same.

1383. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1383, and therefore denies the same.

1384. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1384, and therefore denies the same.

1385. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1385, and therefore denies the same.

1386. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1386, and therefore denies the same.

1387. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1387, and therefore denies the same.

1388. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1388, and therefore denies the same.

1389. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1389, and therefore denies the same.

1390. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1390, and therefore denies the same.

1391. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1391, and therefore denies the same.

1392. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1392, and therefore denies the same.

1393. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1393, and therefore denies the same.

1394. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1394, and therefore denies the same.

1395. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1395, and therefore denies the same.

1396. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1396, and therefore denies the same.

1397. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1397, and therefore denies the same.

1398. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1398, and therefore denies the same.

1399. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1399, and therefore denies the same.

1400. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1400, and therefore denies the same.

1401. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1401, and therefore denies the same.

1402. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1402, and therefore denies the same.

1403. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1403, and therefore denies the same.

1404. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1404, and therefore denies the same.

1405. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1405, and therefore denies the same.

1406. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1406, and therefore denies the same.

1407. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1407, and therefore denies the same.

1408. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1408, and therefore denies the same.

1409. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1409, and therefore denies the same.

1410. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1410, and therefore denies the same.

1411. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1411, and therefore denies the same.

1412. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1412, and therefore denies the same.

1413. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1413, and therefore denies the same.

1414. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1414, and therefore denies the same.

1415. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1415, and therefore denies the same.

1416. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1416, and therefore denies the same.

1417. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1417, and therefore denies the same.

1418. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1418, and therefore denies the same.

1419. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1419, and therefore denies the same.

1420. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1420, and therefore denies the same.

1421. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1421, and therefore denies the same.

1422. Apple denies the allegations in Paragraph 1422.

1423. Apple denies the allegations in Paragraph 1423.

1424. Apple denies the allegations in Paragraph 1424.

TWELFTH COUNT

(Infringement of the '022 patent)

1425. Apple incorporates by reference its responses to Paragraphs 1-1424 of this Answer as if fully set forth herein.

1426. Apple denies the allegations in Paragraph 1426.

1427. Apple denies the allegations in Paragraph 1427.

1428. Apple denies the allegations in Paragraph 1428.

1429. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1429.

1430. Apple denies the allegations in Paragraph 1430.

1431. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1431, and therefore denies the same.

1432. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1432, and therefore denies the same.

1433. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1433, and therefore denies the same.

1434. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1434, and therefore denies the same.

1435. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1435, and therefore denies the same.

1436. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1436, and therefore denies the same.

1437. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1437, and therefore denies the same.

1438. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1438, and therefore denies the same.

1439. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1439, and therefore denies the same.

1440. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1440, and therefore denies the same.

1441. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1441, and therefore denies the same.

1442. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1442, and therefore denies the same.

1443. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1443, and therefore denies the same.

1444. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1444, and therefore denies the same.

1445. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1445, and therefore denies the same.

1446. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1446, and therefore denies the same.

1447. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1447, and therefore denies the same.

1448. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1448, and therefore denies the same.

1449. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1449, and therefore denies the same.

1450. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1450, and therefore denies the same.

1451. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1451, and therefore denies the same.

1452. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1452, and therefore denies the same.

1453. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1453, and therefore denies the same.

1454. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1454, and therefore denies the same.

1455. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1455, and therefore denies the same.

1456. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1456, and therefore denies the same.

1457. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1457, and therefore denies the same.

1458. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1458, and therefore denies the same.

1459. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1459, and therefore denies the same.

1460. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1460, and therefore denies the same.

1461. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1461, and therefore denies the same.

1462. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1462, and therefore denies the same.

1463. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1463, and therefore denies the same.

1464. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1464, and therefore denies the same.

1465. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1465, and therefore denies the same.

1466. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1466, and therefore denies the same.

1467. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1467, and therefore denies the same.

1468. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1468, and therefore denies the same.

1469. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1469, and therefore denies the same.

1470. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1470, and therefore denies the same.

1471. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1471, and therefore denies the same.

1472. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1472, and therefore denies the same.

1473. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1473 , and therefore denies the same.

1474. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1474, and therefore denies the same.

1475. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1475, and therefore denies the same.

1476. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1476, and therefore denies the same.

1477. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1477, and therefore denies the same.

1478. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1478, and therefore denies the same.

1479. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1479, and therefore denies the same.

1480. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1480, and therefore denies the same.

1481. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1481, and therefore denies the same.

1482. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1482, and therefore denies the same.

1483. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1483, and therefore denies the same.

1484. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1484, and therefore denies the same.

1485. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1485, and therefore denies the same.

1486. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1486, and therefore denies the same.

1487. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1487, and therefore denies the same.

1488. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1488, and therefore denies the same.

1489. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1489, and therefore denies the same.

1490. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1490, and therefore denies the same.

1491. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1491, and therefore denies the same.

1492. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1492, and therefore denies the same.

1493. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1493, and therefore denies the same.

1494. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1494, and therefore denies the same.

1495. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1495, and therefore denies the same.

1496. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1496, and therefore denies the same.

1497. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1497, and therefore denies the same.

1498. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1498, and therefore denies the same.

1499. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1499, and therefore denies the same.

1500. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1500, and therefore denies the same.

1501. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1501, and therefore denies the same.

1502. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1502, and therefore denies the same.

1503. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1503, and therefore denies the same.

1504. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1504, and therefore denies the same.

1505. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1505, and therefore denies the same.

1506. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1506, and therefore denies the same.

1507. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1507, and therefore denies the same.

1508. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1508, and therefore denies the same.

1509. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1509, and therefore denies the same.

1510. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1510, and therefore denies the same.

1511. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1511, and therefore denies the same.

1512. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1512, and therefore denies the same.

1513. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1513, and therefore denies the same.

1514. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1514, and therefore denies the same.

1515. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1515, and therefore denies the same.

1516. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1516, and therefore denies the same.

1517. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1517, and therefore denies the same.

1518. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1518, and therefore denies the same.

1519. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1519, and therefore denies the same.

1520. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1520, and therefore denies the same.

1521. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1521, and therefore denies the same.

1522. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1522, and therefore denies the same.

1523. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1523, and therefore denies the same.

1524. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1524, and therefore denies the same.

1525. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1525, and therefore denies the same.

1526. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1526, and therefore denies the same.

1527. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1527, and therefore denies the same.

1528. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1528, and therefore denies the same.

1529. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1529, and therefore denies the same.

1530. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1530, and therefore denies the same.

1531. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1531, and therefore denies the same.

1532. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1532, and therefore denies the same.

1533. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1533, and therefore denies the same.

1534. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1534, and therefore denies the same.

1535. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1535, and therefore denies the same.

1536. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1536, and therefore denies the same.

1537. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1537, and therefore denies the same.

1538. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1538, and therefore denies the same.

1539. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1539, and therefore denies the same.

1540. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1540, and therefore denies the same.

1541. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1541, and therefore denies the same.

1542. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1542, and therefore denies the same.

1543. Apple denies the allegations in Paragraph 1543.

1544. Apple denies the allegations in Paragraph 1544.

1545. Apple denies the allegations in Paragraph 1545.

THIRTEENTH COUNT

(Infringement of the '664 patent)

1546. Apple incorporates by reference its responses to Paragraphs 1-1545 of this Answer as if fully set forth herein.

1547. Apple denies the allegations in Paragraph 1547.

1548. Apple denies the allegations in Paragraph 1548.

1549. Apple denies the allegations in Paragraph 1549.

1550. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1550.

1551. Apple denies the allegations of Paragraph 1551.

1552. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1552, and therefore denies the same.

1553. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1553, and therefore denies the same.

1554. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1554, and therefore denies the same.

1555. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1555, and therefore denies the same.

1556. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1556, and therefore denies the same.

1557. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1557, and therefore denies the same.

1558. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1558, and therefore denies the same.

1559. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1559, and therefore denies the same.

1560. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1560, and therefore denies the same.

1561. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1561, and therefore denies the same.

1562. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1562, and therefore denies the same.

1563. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1563, and therefore denies the same.

1564. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1564, and therefore denies the same.

1565. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1565, and therefore denies the same.

1566. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1566, and therefore denies the same.

1567. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1567, and therefore denies the same.

1568. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1568, and therefore denies the same.

1569. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1569, and therefore denies the same.

1570. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1570, and therefore denies the same.

1571. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1571, and therefore denies the same.

1572. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1572, and therefore denies the same.

1573. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1573, and therefore denies the same.

1574. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1574, and therefore denies the same.

1575. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1575, and therefore denies the same.

1576. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1576, and therefore denies the same.

1577. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1577, and therefore denies the same.

1578. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1578, and therefore denies the same.

1579. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1579, and therefore denies the same.

1580. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1580, and therefore denies the same.

1581. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1581, and therefore denies the same.

1582. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1582, and therefore denies the same.

1583. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1583, and therefore denies the same.

1584. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1584, and therefore denies the same.

1585. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1585, and therefore denies the same.

1586. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1586, and therefore denies the same.

1587. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1587, and therefore denies the same.

1588. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1588, and therefore denies the same.

1589. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1589, and therefore denies the same.

1590. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1590, and therefore denies the same.

1591. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1591, and therefore denies the same.

1592. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1592, and therefore denies the same.

1593. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1593, and therefore denies the same.

1594. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1594, and therefore denies the same.

1595. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1595, and therefore denies the same.

1596. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1596, and therefore denies the same.

1597. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1597, and therefore denies the same.

1598. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1598, and therefore denies the same.

1599. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1599, and therefore denies the same.

1600. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1600, and therefore denies the same.

1601. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1601, and therefore denies the same.

1602. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1602, and therefore denies the same.

1603. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1603, and therefore denies the same.

1604. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1604, and therefore denies the same.

1605. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1605, and therefore denies the same.

1606. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1606, and therefore denies the same.

1607. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1607, and therefore denies the same.

1608. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1608, and therefore denies the same.

1609. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1609, and therefore denies the same.

1610. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1610, and therefore denies the same.

1611. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1611, and therefore denies the same.

1612. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1612, and therefore denies the same.

1613. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1613, and therefore denies the same.

1614. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1614, and therefore denies the same.

1615. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1615, and therefore denies the same.

1616. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1616, and therefore denies the same.

1617. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1617, and therefore denies the same.

1618. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1618, and therefore denies the same.

1619. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1619, and therefore denies the same.

1620. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1620, and therefore denies the same.

1621. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1621, and therefore denies the same.

1622. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1622, and therefore denies the same.

1623. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1623, and therefore denies the same.

1624. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1624, and therefore denies the same.

1625. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1625, and therefore denies the same.

1626. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1626, and therefore denies the same.

1627. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1627, and therefore denies the same.

1628. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1628, and therefore denies the same.

1629. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1629, and therefore denies the same.

1630. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1630, and therefore denies the same.

1631. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1631, and therefore denies the same.

1632. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1632, and therefore denies the same.

1633. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1633, and therefore denies the same.

1634. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1634, and therefore denies the same.

1635. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1635, and therefore denies the same.

1636. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1636, and therefore denies the same.

1637. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1637, and therefore denies the same.

1638. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1638, and therefore denies the same.

1639. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1639, and therefore denies the same.

1640. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1640, and therefore denies the same.

1641. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1641, and therefore denies the same.

1642. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1642, and therefore denies the same.

1643. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1643, and therefore denies the same.

1644. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1644, and therefore denies the same.

1645. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1645, and therefore denies the same.

1646. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1646, and therefore denies the same.

1647. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1647, and therefore denies the same.

1648. Apple denies the allegations in Paragraph 1648.

1649. Apple denies the allegations in Paragraph 1649.

1650. Apple denies the allegations in Paragraph 1650

APPLE'S AFFIRMATIVE DEFENSES TO CORE WIRELESS' COMPLAINT

On information and belief, Apple asserts the following defenses to Core Wireless' Complaint:

First Defense (Non-Infringement)

Core Wireless is not entitled to any relief against Apple because Apple has not directly or indirectly infringed any valid claim of the '277 patent, '347 patent, '181 patent, '959 patent, '271 patent, '321 patent, '143 patent, '850 patent, '679 patent, '045 patent, '860 patent, '022 patent, and '664 patent (the "Core Wireless Asserted Patents").

Second Defense (Invalidity)

One or more of the claims of the Core Wireless Asserted Patents are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and 112.

Third Defense (Unenforceability and/or Authority to Practice)

One or more of the Core Wireless Asserted Patents are unenforceable against Apple, and/or Apple has the authority to practice these patents, on one or more of the following grounds: license (express and/or implied), estoppel, laches, waiver, unclean hands, and/or other applicable equitable doctrines.

COUNTERCLAIMS

Plaintiff-in-counterclaim Apple, on personal knowledge as to its own acts, and on information and belief as to all others based on its own and its attorneys' investigation, alleges Counterclaims against Core Wireless as follows:

NATURE OF ACTION

1. These Counterclaims arise from Core Wireless's baseless allegation of infringement of the Core Wireless Asserted Patents.
2. Upon information and belief, Core Wireless claims to be the owner of all rights, titles, and interests in and to the Core Wireless Asserted Patents.
3. An actual case or controversy exists between the parties concerning the infringement, validity, and enforceability of one or more of the claims of the Core Wireless Asserted Patents.

PARTIES

4. Apple is a corporation organized under the law of the State of California and its principal place of business is in Cupertino, California.

5. According to Core Wireless's Complaint, Core Wireless is a corporation duly organized and existing under the laws of the Grand Duchy of Luxembourg, having a principal place of business at 16, Avenue Pasteur L-2310 Luxembourg.

JURISDICTION AND VENUE

6. The Court has jurisdiction over these Counterclaims pursuant to the Federal Patent Act, 28 U.S.C. §§ 1338(a), 2201, 2202, and 28 U.S.C. §§ 1331, 1337.

7. Core Wireless has subjected itself to personal jurisdiction by suing Apple in this District.

8. As set forth in Apple's Motion to Transfer that it will file shortly, this Court should transfer this action to the United States District Court for the Northern District of California because that is the proper venue for this case. Until the Court rules on that Motion, however, Apple will defend itself in this venue, including by litigating Apple's Counterclaims.

CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '277 Patent)

9. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-8 as if set forth fully herein.

10. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '277 patent.

11. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '277 patent.

SECOND CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '277 Patent)

12. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-11 as if set forth fully herein.

13. One or more claims of the '277 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

14. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '277 patent is invalid.

THIRD CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '347 Patent)

15. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-14 as if set forth fully herein.

16. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '347 patent.

17. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '347 patent.

FOURTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '347 Patent)

18. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-17 as if set forth fully herein.

19. One or more claims of the '347 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

20. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '347 patent is invalid.

FIFTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '181 Patent)

21. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-20 as if set forth fully herein.

22. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '181 patent.

23. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is

entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '181 patent.

SIXTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '181 Patent)

24. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-23 as if set forth fully herein.

25. One or more claims of the '181 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

26. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '181 patent is invalid.

SEVENTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '959 Patent)

27. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-26 as if set forth fully herein.

28. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '959 patent.

29. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '959 patent.

EIGHTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '959 Patent)

30. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-29 as if set forth fully herein.

31. One or more claims of the '959 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

32. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '959 patent is invalid.

NINTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '271 Patent)

33. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-32 as if set forth fully herein.

34. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '271 patent.

35. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '271 patent.

TENTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '271 Patent)

36. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-35 as if set forth fully herein.

37. One or more claims of the '271 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

38. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '271 patent is invalid.

ELEVENTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '321 Patent)

39. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-38 as if set forth fully herein.

40. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '321 patent.

41. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '321 patent.

TWELFTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '321 Patent)

42. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-41 as if set forth fully herein.

43. One or more claims of the '321 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

44. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '321 patent is invalid.

THIRTEENTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '143 Patent)

45. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-44 as if set forth fully herein.

46. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '143 patent.

47. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '143 patent.

FOURTEENTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '143 Patent)

48. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-47 as if set forth fully herein.

49. One or more claims of the '143 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

50. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '143 patent is invalid.

FIFTEENTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '850 Patent)

51. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-50 as if set forth fully herein.

52. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '850 patent.

53. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '850 patent.

SIXTEENTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '850 Patent)

54. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-53 as if set forth fully herein.

55. One or more claims of the '850 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

56. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '850 patent is invalid.

SEVENTEENTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '679 Patent)

57. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-56 as if set forth fully herein.

58. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '679 patent.

59. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '679 patent.

EIGHTEENTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '679 Patent)

60. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-59 as if set forth fully herein.

61. One or more claims of the '679 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

62. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '679 patent is invalid.

NINETEENTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '045 Patent)

63. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-62 as if set forth fully herein.

64. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '045 patent.

65. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '045 patent.

TWENTIETH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '045 Patent)

66. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-65 as if set forth fully herein.

67. One or more claims of the '045 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

68. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '045 patent is invalid.

TWENTY FIRST CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '860 Patent)

69. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-68 as if set forth fully herein.

70. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '860 patent.

71. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '860 patent.

TWENTY SECOND CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '860 Patent)

72. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-71 as if set forth fully herein.

73. One or more claims of the '860 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

74. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '860 patent is invalid.

TWENTY THIRD CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '022 Patent)

75. Apple repeats and realleges the allegations of the preceding counterclaim

Paragraphs 1-74 as if set forth fully herein.

76. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '022 patent.

77. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '022 patent.

TWENTY FOURTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '022 Patent)

78. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-77 as if set forth fully herein.

79. One or more claims of the '022 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

80. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '022 patent is invalid.

TWENTY FIFTH CAUSE OF ACTION

(Declaratory Judgment of Non-Infringement of the '664 Patent)

81. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-80 as if set forth fully herein.

82. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '664 patent.

83. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '664 patent.

TWENTY SIXTH CAUSE OF ACTION

(Declaratory Judgment of Invalidity of the '664 Patent)

84. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-83 as if set forth fully herein.

85. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '664 patent is invalid.

86. One or more claims of the '664 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

PRAYER FOR RELIEF

WHEREFORE, Apple requests that the Court:

- (a) Dismiss the Complaint in its entirety, with prejudice;
- (b) Enter judgment in favor of Apple and against Core Wireless;
- (c) Declare that Apple has not infringed, and is not infringing, each of the Core Wireless Asserted Patents;
- (d) Declare that one or more of the claims of each of the Core Wireless Asserted Patents are invalid, void and/or unenforceable against Apple;
- (e) Grant Apple all reasonable attorneys' fees, experts' fees, and costs;
- (f) Grant such further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff-in-counterclaim Apple hereby demands trial by jury on all issues so triable raised by Core Wireless' Complaint or by Apple's Answer and Counterclaims.

Respectfully submitted,



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Counsel for Apple Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 4th day of June 2012.


Eric M. Albritton